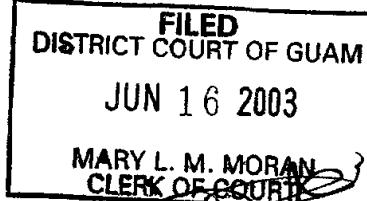


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9 Attorneys for Plaintiff Shell Guam, Inc.
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12 IN THE DISTRICT COURT OF GUAM
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14 03-00021
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SHELL GUAM, INC.,)
a Guam corporation,)
Plaintiff,)
vs.)
M/V GYOKO MARU NO. 18,)
and NIKKI SUISAN CORPORATION,)
a Japan corporation,)
Defendants.)

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CIVIL CASE NO. CIV _____
MOTION FOR ORDER AUTHORIZING
ISSUANCE OF WARRANT OF ARREST
AND DIRECTING MARSHALL TO
ARREST AND TO TAKE POSSESSION
OF VESSEL
[Supplemental Rules C(3) and E(4)
and Local Admiralty Rule E(3)]

COMES NOW Plaintiff Shell Guam, Inc. and alleges as follows:

1. That on June 16, 2003, the above captioned case was filed to foreclose a maritime
lien.
2. Plaintiff Shell Guam, Inc. is entitled to an order for, and arrest of, the M/V Gyoko
Maru No. 18.
3. That the Vessel Gyoko Maru No. 18 is presently located in the Port Authority of
Guam, Piti, Guam USA.

1 Page 2

2 Motion for Order Authorizing Issuance of Warrant of Arrest and Directing Marshall to Arrest and to take Possession of Vessel
3 [Supplemental Rules C(3) and E(4) and Local Admiralty Rule E(3)]
4 Shell Guam, Inc. v. M/V Gyoko Maru No. 18, et al.

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6
7 WHEREFORE, Plaintiff Shell Guam, Inc. moves the Court, pursuant to Supplemental
8 Rules C(3) and E(4) and Local Admiralty Rule E(3) for an order as follows:

- 9 1. Authorizing and directing the Clerk of this Court to issue a Warrant for Arrest of
10 the Vessel Gyoko Maru No. 18.
11 2. Directing the United States Marshall to serve the Warrants for Arrest as provided
12 by law.
13 3. Appointing Captain Jurgen Unterberg to act as custodian and to take possession of
14 the Vessel Gyoko Maru No. 18.
15 4. Providing that the sole responsibility of the United States Marshall is to serve the
16 Warrant for Arrest and that the United States Marshall shall have no responsibility or liability
17 respecting the custody of the Vessel Gyoko Maru No. 18.

18 Dated this 11 day of June 2003.

19 ZAMSKY LAW FIRM
20 Attorneys for Plaintiff Shell Guam, Inc.

21 By: 
22 STEVEN A. ZAMSKY